

**FILED
UNDER
SEAL**

Prob12C
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Rev. March 2017

United States District Court
for
the District of Nevada

PETITION FOR SUMMONS
FOR OFFENDER UNDER SUPERVISION

Name of Offender: **Pierre Franco-Ramos**

Case Number: **2:15CR00286**

Name of Sentencing Judicial Officer: **Honorable Richard F. Boulware**

Date of Original Sentence: **November 13, 2019**

Original Offense: **Misprision of Felony**

Original Sentence: **60 Months probation**

Date Supervision Commenced: **November 13, 2019**

PETITIONING THE COURT

☐ To issue a warrant.

☒ To issue a summons:

The probation officer believes the offender has violated the following condition(s) of supervision:

1. **Must Answer Truthfully** - You must answer truthfully the questions asked by your probation officer.

As a condition of supervision Franco-Ramos was ordered by Your Honor to complete 1,500 hours of community service. On April 11, 2022, Pierre Franco- Ramos submitted letters to the undersigned officer purportedly from Tarkanian Basketball Academy and U.S. Vets Las Vegas showing the completion of 695 hours of community service. Upon receipt of the letters, the undersigned officer reached out to both community service locations provided by Franco- Ramos to verify completion of hours. Mr. Porciuncula,

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the general manager of Tarkanian Facility, was the representative Franco- Ramos provided as the point of contact. Mr. Porciuncula informed the undersigned that Franco-Ramos had volunteered at the facility for a few hours, however, did not complete the 430 hrs. claimed in the letter. Further Mr. Porciuncula stated that he never wrote the letter Franco-Ramos submitted to the probation office.

A subsequent letter provided by Franco-Ramos on April 11, 2022, on behalf of the U.S. Vets Las Vegas stated that Franco-Ramos had completed 265 hrs. of community service work with their organization. The letter further represented that Franco-Ramos was asked to aid in facilitating donations on the organization's behalf. The letter was signed by the Food Service Coordinator, Frank Difloe. A phone call was made to Mr. Difloe, and again the letter was deemed fraudulent. Further, Mr. Difloe stated that Franco-Ramos delivers bread occasionally for the organization through a third-party donor, however, at most Franco-Ramos has volunteered approximately 30 hrs. of work if he were to speak generously.

On May 2, 2022, the undersigned officer met Franco-Ramos in the probation office wherein he was questioned regarding the authenticity of the letters provided. Throughout the conversation Franco-Ramos denied that the letters were fraudulent, maintaining he completed all the hours as stated in the letters; and that the representatives from the respective agencies provided him with the letters to submit to probation. Franco- Ramos continued to deny that the letters were inauthentic, until admonished by the undersigned and told legal action could be taken by the victims for forging their signatures. Franco-Ramos eventually admitted to the forgery, presenting of false documents, and fraudulence in creating the letters.

Franco-Ramos was questioned about the letter provided to our office in March of 2021 from The Crow Tribe representing that he completed at total of 550 hrs. of community service. Franco-Ramos was questioned as to whether The Crow Tribe would state that the letter was created by their organization, Franco-Ramos again admitted to creating the letter and forging the digital signature.

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U.S. Probation Officer Recommendation:

The term of supervision should be:

☒ Revoked

I declare under penalty of perjury that the
information contained herein is true and correct,

Executed on **June 29, 2022**

 Digitally signed by
Amanda Stevens
Date: 2022.06.29
13:30:47 -07'00'

Amanda Stevens
United States Probation Officer

Approved:

 Digitally signed by Todd
Fredlund
Date: 2022.06.29 12:32:15
-07'00'

Todd J. Fredlund
Supervisory United States Probation Officer

THE COURT ORDERS

- ☐ No Action.
☐ The issuance of a warrant.
☒ The issuance of a summons.
☐ Other:



RICHARD F. BOULWARE, II
United States District Judge

August 25, 2022
Date

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**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA
UNITED STATES V. PIERRE FRANCO-RAMOS, 2:15CR00286**

**SUMMARY IN SUPPORT OF PETITION FOR SUMMONS
May 16, 2022**

On November 13, 2019, Pierre Franco-Ramos was sentenced to five (5) years of probation for the offense of Mispriison of Felony.

As previously communicated with Your Honor on February 25, 2022 and April 25, 2022, Franco-Ramos alleged that he completed approximately 1255 hrs. of community service work with three separate organizations, The Crow Tribe in Montana, Tarkanian Basketball Academy, and U.S. Vets of Las Vegas. After review of the alleged hours, it was found that Franco-Ramos did not complete community service hours in the capacity he stated nor anywhere close to the number of hours he alleged. Further, Franco-Ramos manufactured letters on behalf of three entities and used juxtaposition to forge the signatures of three separate gentlemen without their consent.

Franco-Ramos previously submitted a letter to his probation officer dated December 5, 2020, purportedly from the Crow Tribe representing that he completed 550 hours of community service. On February 4, 2022, the undersigned officer met with Franco-Ramos in the probation office to discuss restitution, community service, his employment, and finances. During this meeting Franco-Ramos was questioned about completion of 550 hours of community service with the Crow Tribe. Franco-Ramos was defensive and stated that the hours were worked without receiving form of payment, and therefore he deemed those hours as community service work. Franco-Ramos was informed a phone call would be made to The Crow Tribe to verify the information in the letter given to Probation, he immediately retracted the hours and stated that he made a mistake. Franco was informed that the community service with The Crow Tribe would not be considered toward his condition of 1500 hrs. of community service work and Franco-Ramos was in accord.

On April 11, 2022, Franco-Ramos submitted the two additional letters from two local non-profit organizations stating that he had completed a total of 695 hrs. of work. Upon telephonic contact with both points of contact for the non-profit organizations, it was determined that neither Tarkanian Basketball Academy nor The U.S. Vets of Las Vegas would vouch for the completed hours. Further Mr. Porciuncula, Tarkanian Basketball Academy, stated that Franco- Ramos completed a few hours, but nothing more. Mr. Porciuncula was made aware of possible third-party risks given the fact that Franco- Ramos used his signature to forge a fraudulent letter and could possibly utilize the signature for other means as well. Mr. Porciuncula was offended by

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Franco-Ramos's actions and stated to undersigned that he would not be welcomed back to volunteer.

The action of Franco-Ramos positioning the general manager while volunteering minimal hours at Tarkanian's facility with the intention to obtain his signature for later use is egregious. The act of planning to utilize a community service log sheet to then later steal the signature to doctor a fictitious letter on his own behalf demonstrates Franco-Ramos's level of craftiness and manipulation. Although the action seems minor in comparison to other possible violations, Franco-Ramos harbors a criminal way of thinking.

Franco-Ramos stated that he on occasion rents a court at Tarkanian gym for his son to play basketball with friends. Franco-Ramos embellished stating that some of his son's friends are less fortunate and by allowing them to share the court time he pays for it is community service work. It is not likely that Franco-Ramos is familiar enough with his son's friends' finances to deem whether they are considered less fortunate. It is unknown currently what specifically Franco-Ramos is basing this justification on, however, to rent a basketball court for his son's leisure along with his friends would in no way constitute community service work. Franco-Ramos's sons' recreation does not play a role in restoring or bettering the community whatsoever.

Mr. Difloe from the U.S. Vets Las Vegas was also made aware of third-party risks due to the information provided and the fact the Franco-Ramos juxtaposed the information on U.S. Vet letterhead with Mr. Difloe's signature. Mr. Difloe was informed that Franco-Ramos illegally used his signature to sign the community service letter and was informed that he could write other letters on behalf of The U.S. Vets which could pose potential risks. Mr. Difloe was informed that the letter stated on his behalf that Franco-Ramos was asked by their organization to aid in facilitating donations. Mr. Difloe was disappointed and stated that he would no longer work with Franco-Ramos. Mr. Difloe stated that Franco-Ramos was never asked to facilitate donations on behalf of their agency.

The Court is likely aware of the potential risks at play by Franco-Ramos utilizing letterhead and the signature on behalf of the U.S. Vets. At any time, Franco-Ramos could produce another letter asking for financial support on behalf of the U.S. Vets. By way of case history, Franco-Ramos exploited small businesses by making false and fraudulent representations of potential grant opportunities for their businesses for his own financial gain.

Your Honor deviated from the guideline range at sentencing and allowed Franco-Ramos to remain at liberty. Instead of utilizing his grant of probation productively, Franco-Ramos has on more than one occasion attempted to dupe the Court and the U.S. Probation Office regarding completion of his community service hours.


The conduct detailed in this petition lends credence to the assertion that Franco-Ramos is committing a breach of the Court's trust. The Probation Officer respectfully requests issuance of

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a summons for Franco-Ramos to appear before Your Honor to show cause why probation should not be revoked.

Respectfully submitted,

 Digitally signed by
Amanda Stevens
Date: 2022.06.29
13:31:42 -07'00'

Amanda Stevens
United States Probation Officer

Approved:

•  Digitally signed by Todd
Fredlund
Date: 2022.06.29
12:32:36 -07'00'

Todd J. Fredlund
Supervisory United States Probation Officer